

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

GEOSCOPE TECHNOLOGIES PTE. LTD.,  
Plaintiff,

v.

Civil Action No. 1:22-cv-01373-MSN-JFA

APPLE INC.,  
Defendant.

**CONSENT MOTION FOR EXTENSION OF TIME FOR APPLE INC. TO FILE ITS  
RESPONSE TO THE COMPLAINT**

The defendant, Apple Inc. (“Apple”), by its counsel by special appearance, and without waiving any jurisdiction, venue, or other challenges, moves this Court for an extension of time through January 10, 2023, to answer, plead, claim, move, or otherwise respond to the Complaint filed by Geoscope Technologies Pte. Ltd. (“Geoscope”), and in support thereof states as follows:

1. On December 1, 2022, Geoscope filed its Complaint for patent infringement against Apple. On December 6, 2022, Geoscope served its Complaint upon Apple’s registered agent.

2. Under Rule 12 of the Federal Rules of Civil Procedure, Apple’s responsive pleadings are not due until December 27, 2022.

3. On Apple’s request, Geoscope has consented to allow Apple an extension of time through and including January 10, 2023, for Apple to answer, plead, claim, move, or otherwise respond to the Complaint filed by Geoscope. The proposed extension is necessary to allow Apple additional time to investigate the matter, which is particularly necessary in view of the intervening federal holidays and Apple’s upcoming holiday break from December 24, 2022, through January 2, 2023. Moreover, the extension will not cause delay or prejudice to either party.

4. Apple has submitted a proposed consent order granting Apple an extension of time through and including January 10, 2023, to answer, plead, claim, move, or otherwise respond to the Complaint filed by Geoscope.

5. ***The parties waive a hearing on this procedural motion.*** Should the Court deem a hearing necessary, however, the parties will appear as directed.

WHEREFORE, Apple, by counsel, requests that this Court enter the attached proposed agreed order granting Apple an extension of time through and including January 10, 2023, to answer, plead, claim, move, or otherwise respond to the Complaint.

Dated: December 20, 2022

Respectfully submitted,

*Of Counsel for Defendant Apple Inc.:*

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